

The Honorable Ricardo S. Martinez

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,)
Petitioner,) Case No. 2:15-cv-00102 RSM
v.)
MICROSOFT CORPORATION, *et al.*)
Respondents.)

)
UNITED STATES' EXHIBIT LIST

In accordance with the order orally entered by the Court at the telephonic hearing held on July 7, 2015, the United States submits its exhibit list¹, in preparation for the evidentiary hearing to be conducted on July 21, 2015.

1. Administrative record for Treasury Regulation § 301.7602.1T(b) (as certified for the July 21, 2015 hearing).
2. Contract for the provision of expert services between the Internal Revenue Service and Quinn Emanuel Urquhart & Sullivan, LLP, executed on May 19, 2014.

¹ In addition to the documents identified here, the United States also incorporates into its list its exhibits previously submitted in the record and accepted by the Court as stated during the July 7, 2015 telephonic hearing.

1 3. Transcript of September 22, 2014 interview of witness Chris Caposella.

2 4. Transcript of September 23, 2014 interview of witness Bob Kelly.

3 5. Transcript of September 24, 2014 interview of witness Allison Watson.

4 6. Transcript of September 25, 2014 interview of witness David Hamilton.

5 7. Transcript of October 7, 2014 interview of witness Marlena Werder.

6 8. Transcript of October 10, 2014 interview of witness Chris Suh.

7 9. July 12, 2012 audit timeline.

8 10. January 31, 2013 audit timeline.

9 11. May 30, 2013 audit timeline.

10 12. Office of Management and Budget Policy Letter 11-01, Performance of Inherently
11 Governmental and Critical Functions.

12 13. Internal Revenue Service designated summons issued to Microsoft Corporation and
13 includible subsidiaries on October 30, 2014.

14 14. Preliminary Transfer Pricing Analysis of Microsoft's Cost Shared Americas Retail
15 Business presentation dated January 14, 2014.

16 15. Estimation of the Fair Market Value of Certain Entities of Microsoft Corporation dated
17 June 19, 2006.

18 16. Letter from Microsoft Corporation to the Internal Revenue Service dated June 29, 2011,
19 and attached Brief in Support of Protest of Proposed Adjustments to the Tax Liability of
20 Microsoft Corporation & Subsidiaries for Taxable Years Ended June 30, 2004-2006,
21 regarding Issues 1 and 2.

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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the foregoing has been made this 10th day of July, 2015, via the Court's ECF system to all parties and electronically to the following:

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/s James E. Weaver
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